

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RUTH HEINE,

Plaintiff,

V.

PARKWAY AUTO REALISATIONS, LLC,
f/k/a AUTO EUROPE, LLC, d/b/a
AUTO EUROPE,

Defendants.

Civil Action Docket No: 05-11117 REK

**MOTION TO ADMIT ATTORNEY ELLA L. BROWN *PRO HAC VICE*
PURSUANT TO LOCAL RULE 83.5.3**

(1) Defendant Auto Europe LLC, d/b/a Auto Europe (erroneously sued as Parkway Auto Realisations, f/k/a Auto Europe LLC d/b/a Auto Europe), seeks to have Attorney Ella L. Brown appear as counsel in the above matter in the U.S. District Court for the District of Massachusetts, pursuant to Local Rule 83.5.3.

(2) I, Robert H. Stier, Jr., am a member of the bar of this Court and have entered an appearance for Defendant Auto Europe, LLC. I am a partner in the law firm of Pierce Atwood LLP.

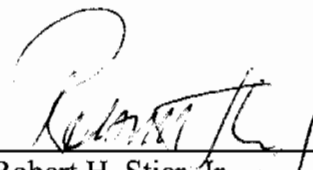
(3) I am associated with Attorney Ella L. Brown, who is a partner in the law firm of
Pierce Atwood LLP.

(4) Accompanying this motion is a Certificate by Ella L. Brown certifying that she meets the requirements specified in Local Rule 83.5.3.

(5) No memorandum of law is necessary in connection with this motion because the relief requested is within the discretion of the Court.

WHEREFORE, I hereby move that Ella L. Brown be granted leave pursuant to Local Rule 83.5.3 to appear and practice before this Court in the above-named matter.

Dated: 8/15/05



Robert H. Stier, Jr.
PIERCE ATWOOD LLP
One Monument Square
Portland, ME 04101
207-791-1100

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RUTH HEINE,

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V.

PARKWAY AUTO REALISATIONS, LLC,
f/k/a AUTO EUROPE, LLC, d/b/a
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**CERTIFICATE OF ELLA L. BROWN FOR ADMISSION
PRO HAC VICE IN THE U.S. DISTRICT COURT,
DISTRICT OF MASSACHUSETTS**

Pursuant to Local Rule 83.5.3, Robert H. Stier, Jr., (Bar No. 646725), who has entered an appearance in this case, has moved this Court to grant leave to Ella L. Brown to practice before this Court in this particular case.


Furthermore, I, Ella L. Brown, do hereby certify the following:

- 1) I am a member in good standing of the bars of the States of Maine and California and the Commonwealth of Virginia.
- 2) My office address and telephone number are: Pierce Atwood LLP, One Monument Square, Portland, ME 04101 (207-791-1100).
- 3) There are no disciplinary proceedings pending against me as a member of any bar in any jurisdiction.
- 4) I am familiar with the Local Rules of the U.S. District Court for the District of Massachusetts.

Accordingly, I request that this Court grant me leave to practice in the U.S. District Court for the District of Massachusetts in the case entitled *Ruth Heine v. Parkway Auto Realizations, LLC, f/k/a Auto Europe, LLC, d/b/a Auto Europe*, No. 05-11117-REK.

Sworn to this date under penalties of perjury.

Dated: August 18, 2005

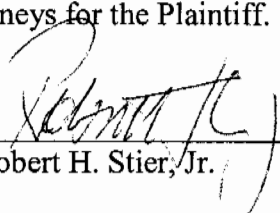


Ella L. Brown
PIERCE ATWOOD LLP
One Monument Square
Portland, ME 04101
207-791-1100

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2005, a copy of the foregoing Motion and Certificate was served, via first class mail, postage prepaid, on Sol J. Cohen, Esq., Cohen & Sales, 43 Thorndike St., Cambridge, MA 02141, attorneys for the Plaintiff.



Robert H. Stier, Jr.